

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

Civil Docket Number: _____

IRAN SHORT FORM
COMPLAINT AND DEMAND
FOR TRIAL BY JURY

Matthew Rowenhorst, individually, as surviving sibling of Edward Rowenhorst

John Doe 53, being intended to designate the Personal Representative of the Estate of Edward Rowenhorst, deceased, said name being fictitious, her/his true name is not presently known, confirmed, and/or has not been duly appointed by a court of competent jurisdiction (or having been so appointed, his or her appointment has expired, and/or he or she has ceased to serve, and his or her successor has not yet been appointed) and on behalf of all survivors and all legally entitled beneficiaries and family members of Edward Rowenhorst

John Doe 54, being intended to designate the Personal Representative of the Estate of Michael Russo, deceased, said name being fictitious, her/his true name is not presently known, confirmed, and/or has not been duly appointed by a court of competent jurisdiction (or having been so appointed, his or her appointment has expired, and/or he or she has ceased to serve, and his or her successor has not yet been appointed) and on behalf of all survivors and all legally entitled beneficiaries and family members of Michael Russo

Anthony F. Russo, individually, as surviving sibling of Michael Russo

John Doe 55, being intended to designate the Personal Representative of the Estate of Nolbert Salomon, deceased, said name being fictitious, her/his true name is not presently known, confirmed, and/or has not been duly appointed by a court of competent jurisdiction (or having been so appointed, his or her appointment has expired, and/or he or she has ceased to serve, and his or her successor has not yet been appointed) and on behalf of all survivors and all legally entitled beneficiaries and family members of Nolbert Salomon

John Doe 56, being intended to designate the Personal Representative of the Estate of Kathryn A. Shatzoff, deceased, said name being fictitious, her/his true name is not presently known, confirmed, and/or has not been duly appointed by a court of competent jurisdiction (or having been so appointed, his or her appointment has expired, and/or he or she has ceased to serve, and his or her successor has not yet been appointed) and on behalf of all survivors and all legally entitled beneficiaries and family members of Kathryn A. Shatzoff

John Doe 57, being intended to designate the Personal Representative of the Estate of Gregory Sikorsky, deceased, said name being fictitious, her/his true name is not presently known, confirmed, and/or has not been duly appointed by a court of competent jurisdiction (or having been so appointed, his or her appointment has expired, and/or he or she has ceased to serve, and his or her successor has not yet been appointed) and on behalf of all survivors and all legally entitled beneficiaries and family members of Gregory Sikorsky

George Sikorsky, individually, as surviving sibling of Gregory Sikorsky

Perry J. Sikorsky, individually, as surviving sibling of Gregory Sikorsky

John Doe 58, being intended to designate the Personal Representative of the Estate of Arthur Simon, deceased, said name being fictitious, her/his true name is not presently known, confirmed, and/or has not been duly appointed by a court of competent jurisdiction (or having been so appointed, his or her appointment has expired, and/or he or she has ceased to serve, and his or her successor has not yet been appointed) and on behalf of all survivors and all legally entitled beneficiaries and family members of Arthur Simon

John Doe 59, as Personal Representative of the Estate of Kenneth Simon, deceased, the late child of Arthur Simon

John Doe 60, being intended to designate the Personal Representative of the Estate of Kenneth Simon, deceased, said name being fictitious, her/his true name is not presently known, confirmed, and/or has not been duly appointed by a court of competent jurisdiction (or having been so appointed, his or her appointment has

expired, and/or he or she has ceased to serve, and his or her successor has not yet been appointed) and on behalf of all survivors and all legally entitled beneficiaries and family members of Kenneth Simon

Mandy Exantus, individually, as surviving sibling of Kenneth Simon

Todd Simon, individually, as surviving sibling of Kenneth Simon

Susan Simon, individually, as surviving parent of Kenneth Simon

Jennifer Simon Berardi, individually, as surviving sibling of Kenneth Simon

John Doe 61, as Personal Representative of the Estate of Arthur Simon, deceased, the late parent of Kenneth Simon

John Doe 62, being intended to designate the Personal Representative of the Estate of Timothy Stackpole, deceased, said name being fictitious, her/his true name is not presently known, confirmed, and/or has not been duly appointed by a court of competent jurisdiction (or having been so appointed, his or her appointment has expired, and/or he or she has ceased to serve, and his or her successor has not yet been appointed) and on behalf of all survivors and all legally entitled beneficiaries and family members of Timothy Stackpole

Michael Stackpole, individually, as surviving sibling of Timothy Stackpole

Edward Stackpole, individually, as surviving sibling of Timothy Stackpole

Kathy Buell, individually, as surviving sibling of Timothy Stackpole

Patricia Murphy, individually, as surviving sibling of Timothy Stackpole

Jordanis Theodoridis, individually, as surviving sibling of Michael Theodoridis

Jordanis Theodoridis, as the Personal Representative of the Estate of Michael Theodoridis, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of Michael Theodoridis

Jordanis Theodoridis, as Personal Representative of the Estate of Constantinos Theodoridis, deceased, the late parent of Michael Theodoridis

Margarita Theodoridis, individually, as surviving parent of Michael Theodoridis

Haleema Salie, as Personal Representative of the Estate of Rahma Salie, deceased, the late spouse of Michael Theodoridis

Nia Jah-Selah Thompson, individually, as surviving child of Vanavah Thompson

Tsahai S. Santiago, individually, as surviving sibling of Vanavah Thompson

Rahsaan Thompson, individually, as surviving child of William Harry Thompson

Michael K. Thompson, individually, as surviving child of William Harry Thompson

Michael K. Thompson, as the Personal Representative of the Estate of William Harry Thompson, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of William Harry Thompson

Margaret M. Tobin, individually, as surviving sibling of John Tobin

Michael Tobin, individually, as surviving sibling of John Tobin

Jennifer Dolan, individually, as surviving child of John Tobin

Barbara Tobin, individually, as surviving spouse of John Tobin

Barbara Tobin, as the Personal Representative of the Estate of John Tobin, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of John Tobin

Sean Tobin, individually, as surviving child of John Tobin

Salvatore M. Traina Jr., individually, as surviving sibling of Christopher M. Traina

Vasanta Velamuri, as the Personal Representative of the Estate of Sankara Velamuri, deceased, and on behalf of all survivors and all legally entitled

beneficiaries and family members of Sankara Velamuri

Jennica Perez a/k/a Jennica Vera, individually, as surviving child of David Vera

Jennica Perez a/k/a Jennica Vera, as the Personal Representative of the Estate of David Vera, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of David Vera

Javier Guzman, individually, as surviving sibling of David Vera

Clotilda Vola as Personal Representative of the Estate of John Vola, deceased, the late parent of Maria P. Vola

Clotilda Vola as Personal Representative of the Estate of Rita Vola, deceased, the late parent of Maria P. Vola

Clarissa B. Kirschenbaum, individually, as surviving sibling of Victor Wald

John Doe 63, being intended to designate the Personal Representative of the Estate of Robert F. Wallace, deceased, said name being fictitious, her/his true name is not presently known, confirmed, and/or has not been duly appointed by a court of competent jurisdiction (or having been so appointed, his or her appointment has expired, and/or he or she has ceased to serve, and his or her successor has not yet been appointed) and on behalf of all survivors and all legally entitled beneficiaries and family members of Robert F. Wallace

Shirley Nottingham, individually, as surviving sibling of Leonard A. White

Shirley Nottingham, as the Personal Representative of the Estate of Leonard A. White, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of Leonard A. White

Shirley Nottingham as Personal Representative of the Estate of Thelma White, deceased, the late parent of Leonard A. White

Marc C. White, individually, as surviving sibling of Malissa White

Sylvia Ball, individually, as surviving sibling of
Malissa White

John Doe 64, being intended to designate the Personal Representative of the Estate of Sandra L. White, deceased, said name being fictitious, her/his true name is not presently known, confirmed, and/or has not been duly appointed by a court of competent jurisdiction (or having been so appointed, his or her appointment has expired, and/or he or she has ceased to serve, and his or her successor has not yet been appointed) and on behalf of all survivors and all legally entitled beneficiaries and family members of Sandra L. White

John Doe 65, being intended to designate the Personal Representative of the Estate of Wayne White, deceased, said name being fictitious, her/his true name is not presently known, confirmed, and/or has not been duly appointed by a court of competent jurisdiction (or having been so appointed, his or her appointment has expired, and/or he or she has ceased to serve, and his or her successor has not yet been appointed) and on behalf of all survivors and all legally entitled beneficiaries and family members of Wayne White

Daren White, individually, as surviving sibling of
Wayne White

Showkatara Sharif, as the Personal Representative of the Estate of Shakila Yasmin, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of Shakila Yasmin

John Doe 66 as Personal Representative of the Estate of Nurul Miah, deceased, the late spouse of Shakila Yasmin

Mary Kessler, individually, as surviving sibling of
Suzanne Youmans

Mary Kessler, as the Personal Representative of the Estate of Suzanne Youmans, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of Suzanne Youmans

Joan Youmans as Personal Representative of the Estate of John Youmans, deceased, the late sibling of
Suzanne Youmans

BNY Mellon, as the Personal Representative of the Estate of Martin Morales Zempoaltecatl, deceased, and

on behalf of all survivors and all legally entitled beneficiaries and family members of Martin Morales Zempoaltecatl

Julia Morales Zempoaltecatl, individually, as surviving sibling of Martin Morales Zempoaltecatl

Maria P.M. Zempoaltecatl Cortez, individually, as surviving parent of Martin Morales Zempoaltecatl

Benjamin Morales Zempoaltecatl, individually, as surviving sibling of Martin Morales Zempoaltecatl

Jose Morales Zempoaltecatl, individually, as surviving sibling of Martin Morales Zempoaltecatl

Delfino Morales Zempoaltecatl, individually, as surviving sibling of Martin Morales Zempoaltecatl

Eusebio Morales Zempoaltecatl, individually, as surviving sibling of Martin Morales Zempoaltecatl

Glafira Morales Zempoaltecatl, individually, as surviving sibling of Martin Morales Zempoaltecatl

Gonzalo Morales, individually, as surviving sibling of Martin Morales Zempoaltecatl

Daryl Gabriel, individually, as surviving child of Benilda Domingo

Jessica K. Kostaris, individually, as surviving child of Bruce Gary

Richard Gary, individually, as surviving child of Bruce Gary

Kristen C. Graf, individually, as surviving child of Edwin John Graf III

Tyler W. Graf, individually, as surviving child of Edwin J. Graf, III

Wesley J. Graf, individually, as surviving child of Edwin J. Graf, III

Jane Doe 69, as Personal Representative of the Estate of William J. Houston, deceased, the late sibling of Charles J. Houston

Andrew McMahon, individually, as surviving sibling of Robert D. McMahon

Damon McMahon, individually, as surviving sibling of Robert D. McMahon

Constance Muldowney, individually, as surviving

spouse of Richard Muldowney

Constance Muldowney, as the Personal Representative of the Estate of Richard Muldowney, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of Richard Muldowney

John Muldowney, individually, as surviving child of Richard Muldowney

Constance Muldowney as Personal Representative of the Estate of Kathryn Muldowney, deceased, the late child of Richard Muldowney

Thomas F. Owens, individually, as surviving sibling of Peter Owens

John Owens, individually, as surviving sibling of Peter Owens

Terence Owens, individually, as surviving sibling of Peter Owens

Kevin Owens, individually, as surviving sibling of Peter Owens

Susan G. Rescorla, individually, as surviving spouse of Richard C. Rescorla

Susan G. Rescorla, as the Personal Representative of the Estate of Richard C. Rescorla, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of Richard C. Rescorla

Trevor S. Rescorla, individually, as surviving child of Richard C. Rescorla

Kimberly J. Rescorla, individually, as surviving child of Richard C. Rescorla

Andrew Soulas, individually, as surviving child of Timothy Soulas

Christopher Soulas, individually, as surviving child of Timothy Soulas

Matthew Soulas, individually, as surviving child of Timothy Soulas

Timothy Soulas Jr., individually, as surviving child of Timothy Soulas

Katherine Soulas, individually, as surviving spouse of

Timothy Soulas

Katherine Soulas, as the Personal Representative of the Estate of Timothy Soulas, deceased, and on behalf of all survivors and all legally entitled beneficiaries and family members of Timothy Soulas

Katherine Soulas, as Natural Guardian of DRS, a minor, as surviving child of Timothy Soulas

Aaron Straub, individually, as surviving child of Edward Straub

Plaintiffs,

-against-

Islamic Republic of Iran,

Defendant.

Plaintiffs named herein by and through the undersigned counsel file this Short Form Complaint against Defendant, the Islamic Republic of Iran (“Iran”), arising out of the September 11, 2001 terrorist attacks (“September 11, 2001 Terrorist Attacks”), as permitted and approved by the Court’s Order of July 10, 2018, ECF No. 4045. Each Plaintiff incorporates by reference the specific allegations, as indicated below, of (a) the Federal Insurance and Ashton Plaintiffs’ Amended Consolidated Complaint Against Defendant, the Islamic Republic of Iran, ECF No. 3237, or (b) the Amended Complaint, Burnett v. Islamic Republic of Iran, No. 15-CV-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53.

Upon filing this Iran Short Form Complaint, each Plaintiff is deemed to have adopted all factual and jurisdictional allegations of the complaint that has been joined as specified below; all causes of action contained within that complaint; all prior filings in connection with that complaint; and all prior Orders and rulings of the Court in connection with that complaint.

Additionally, each Plaintiff incorporates the factual allegations and findings contained in those pleadings and orders filed at Havlish v. Bin Laden, No. 1:03-CV-9848 (GBD)(SN)

(S.D.N.Y.), ECF Nos. 263, 294, 295; In re Terrorist Attacks on September 11, 2001, 03-MDL-1570 (GBD)(SN) (S.D.N.Y.), ECF Nos. 2430, 2431, 2432, 2433, 2473, 2515, 2516; and evidence submitted at the proceedings before the Honorable George B. Daniels on December 15, 2011 (ECF No. 2540).

VENUE

1. Venue in this district is proper pursuant to 28 U.S.C. §§ 1391(b)(2) and 1391(f)(1), as a substantial part of the events giving rise to the claims asserted herein occurred in this district. Venue is also proper in this district pursuant to 18 U.S.C. § 2334(a).

JURISDICTION

2. Jurisdiction against the Islamic Republic of Iran is premised on the grounds set forth in the complaints specified below, including but not limited to 28 U.S.C. § 1605(a) (tort exception to the Foreign Sovereign Immunities Act), 28 U.S.C. § 1605A (terrorism exception to the Foreign Sovereign Immunities Act), and 28 U.S.C. § 1605B (Justice Against Sponsors of Terrorism Act).

CAUSES OF ACTION

3. Each Plaintiff hereby adopts and incorporates by reference all factual allegations, jurisdictional allegations, and jury trial demand, including all causes of action against the Islamic Republic of Iran, as set forth in the following complaint [**check only one complaint**]:

☐ Federal Insurance and Ashton Plaintiffs' Amended Consolidated Complaint Against Defendant, the Islamic Republic of Iran, ECF No. 3237

☒ Amended Complaint, Burnett v. Islamic Republic of Iran, No. 15-CV-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53

4. In addition, each Plaintiff hereby asserts the following additional causes of action:

☒ Iran Short Form Complaint First Cause of Action to Recover Wrongful Death Damages Pursuant to 28 U.S.C. § 1605B (the Justice Against Sponsors of Terrorism Act or JASTA) and 18 U.S.C. § 2333 *et seq.* (the Anti-Terrorism Act or ATA)

As a factual basis for this cause of action, Plaintiff(s) allege that the allegations set forth in the complaint noted above, as well as the allegations set forth in the Havlish filings noted above, establish that, as set forth herein, the injuries they suffered arose from the September 11, 2001 Terrorist Attacks; Defendant's role in the September 11, 2001 Terrorist Attacks constituted acts of international terrorism that violated state and federal laws pursuant to 18 U.S.C. § 2331; that the September 11, 2001 Terrorist Attacks constituted acts of international terrorism committed, planned or authorized by an organization that had been designated as a foreign terrorist organization under 8 U.S.C. § 1189; that the September 11, 2001 Terrorist Attacks violated state and federal laws pursuant to 18 U.S.C. § 2331; and that Defendant aided and abetted, by knowingly providing substantial assistance, with others and/or conspired with others who committed an act or acts of international terrorism in violation of 18 U.S.C. § 2333 *et seq.*

☐ Iran Short Form Complaint First Cause of Action to Recover Personal Injury Damages Pursuant to 28 U.S.C. § 1605B (the Justice Against Sponsors of Terrorism Act or JASTA) and 18 U.S.C. § 2333 *et seq.* (the Anti-Terrorism Act or ATA)

As a factual basis for this cause of action, Plaintiff(s) allege that the allegations set forth in the complaint noted above, as well as the allegations set forth in the Havlish filings noted above, establish that, as set forth herein, the injuries they suffered arose from the September 11, 2001 Terrorist Attacks; Defendant's role in the September 11, 2001 Terrorist Attacks constituted acts of international terrorism that violated state and federal laws pursuant to 18 U.S.C. § 2331; that the September 11, 2001 Terrorist Attacks constituted acts of international terrorism committed, planned or authorized by an organization that had been designated as a foreign terrorist organization under 8 U.S.C. § 1189; that the September 11, 2001 Terrorist Attacks violated state and federal laws pursuant to 18 U.S.C. § 2331; and that Defendant aided and abetted, by knowingly providing substantial assistance, with others and/or conspired with others who committed an act or acts of international terrorism in violation of 18 U.S.C. § 2333 *et seq.*

IDENTIFICATION OF NEW PLAINTIFFS

5. The following allegations and information are alleged on behalf of each individual who is bringing this claim, as indicated on Appendix 1 to this Iran Short Form Complaint, herein referred to as "Plaintiffs."

- a. The citizenship/nationality of each Plaintiff is indicated at Appendix 1 to this Iran Short Form Complaint.
- b. Plaintiff is entitled to recover damages on the causes of action set forth in the complaint identified above, as joined by this Iran Short Form Complaint, and as further asserted within this Iran Short Form Complaint.

- c. As indicated at Appendix 1, Plaintiff (i) is the estate representative of someone who was killed as a result of the September 11, 2001 Terrorist Attacks; (ii) is the surviving immediate family member of someone who was killed as a result of the September 11, 2001 Terrorist Attacks; and/or (iii) suffered physical injuries as a result of the September 11, 2001 Terrorist Attacks.
- d. For those plaintiffs with personal injury claims, as indicated in Appendix 1, on or after September 11, 2001, said Plaintiff was present at the Pentagon and/or the World Trade Center site and/or its surroundings and/or lower Manhattan and/or at an area wherein he/she was exposed to toxins as a result of the terrorist attacks and was exposed to toxins from the attacks, and/or was otherwise injured, and/or as otherwise alleged, as stated specifically in Appendix 1.
- e. For those plaintiffs with personal injury and/or wrongful death claims, as indicated in Appendix 1, as a direct, proximate and foreseeable result of Defendant's actions or inactions, Plaintiff or his or her decedent suffered bodily injury and/or death, and consequently economic and other losses, including but not limited to pain and suffering, emotional distress, psychological injuries, and loss of enjoyment of life, and/or as described in the Iran Short Form Complaint, and/or as otherwise may be specified in subsequent discovery proceedings, and/or as otherwise alleged in Appendix 1.
- f. The name, relationship to the injured and/or deceased September 11 victim, residency, citizenship/nationality, and the general nature of the claim for each plaintiff asserting wrongful death and/or solatium claims is listed on the attached Appendix 1, and is incorporated herein as allegations, with all allegations of the related complaints, as specified above, deemed alleged as to each Plaintiff.

IDENTIFICATION OF THE DEFENDANT

6. The only Defendant named in this Iran Short Form Complaint is the Islamic Republic of Iran.

NO WAIVER OF OTHER CLAIMS

7. By filing this Iran Short Form Complaint, Plaintiffs are not waiving any right to file suit against any other potential defendants or parties.

8. By filing this Iran Short Form Complaint, Plaintiffs are not opting out of any class that the Court may certify in the future.

JURY DEMAND

9. Each Plaintiff hereby demands a trial by jury as to the claims in this action.

WHEREFORE, Plaintiffs pray for relief and judgment against Defendant as set forth in this Iran Short Form Complaint as appropriate.

Dated: December 31, 2018

Respectfully submitted,

/s/ Bruce Strong

Jerry S. Goldman

Bruce Strong

ANDERSON KILL P.C.

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New York, New York

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Attorneys for Plaintiffs

APPENDIX

Each line below is deemed an allegation, incorporating the allegations, language, and references within the Iran Short Form Complaint to which this Appendix 1 is appended and shall be referenced as Allegation 1 of Appendix 1 to the Iran Short Form Complaint, Allegation 2 of Appendix 1 to the Iran Short Form Complaint, etc.

	Plaintiff's Name (alphabetical by last name)	Plaintiff's State of Residency at Filing (or death)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Full Name	Plaintiff's Relationship to 9/11 Decedent¹	9/11 Decedent's Citizenship/ Nationality on 9/11/01	Nature of Claim (wrongful death, solatium, personal injury)²
1	Matthew Rowenhorst	IA	United States	Edward Rowenhorst	Sibling	United States	Solatium
2	John Doe 53	VA	United States	Edward Rowenhorst	PR	United States	Solatium/ Wrongful Death
3	John Doe 54	NY	United States	Michael Russo	PR	United States	Solatium/ Wrongful Death
4	Anthony F. Russo	NJ	United States	Michael Russo	Sibling	United States	Solatium
5	John Doe 55	NY	United States	Nolbert Salomon	PR	United States	Solatium/ Wrongful Death
6	John Doe 56	NY	United States	Kathryn A. Shatzoff	PR	United States	Solatium/ Wrongful Death
7	John Doe 57	NY	United States	Gregory Sikorsky	PR	United States	Solatium/ Wrongful Death
8	George Sikorsky	NY	United States	Gregory Sikorsky	Sibling	United States	Solatium
9	Perry J. Sikorsky	NY	United States	Gregory Sikorsky	Sibling	United States	Solatium

¹ For those identified as "PR," such claim is made as the Personal Representative of the Decedent's Estate and on behalf of all survivors and all legally entitled beneficiaries and family members of such Decedent as noted in the case caption.

² The PRs identified below are bringing solatium claims on behalf of all survivors and all legally entitled beneficiaries and family members of such Decedent as noted in the case caption.

	Plaintiff's Name (alphabetical by last name)	Plaintiff's State of Residency at Filing (or death)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Full Name	Plaintiff's Relationship to 9/11 Decedent¹	9/11 Decedent's Citizenship/ Nationality on 9/11/01	Nature of Claim (wrongful death, solatium, personal injury)²
10	John Doe 58	NY	United States	Arthur Simon	PR	United States	Solatium/ Wrongful Death
11	John Doe 59, as Personal Representative of the Estate of Kenneth Simon	NJ	United States	Arthur Simon	Child (Deceased)	United States	Solatium
12	John Doe 60	NJ	United States	Kenneth Simon	PR	United States	Solatium/ Wrongful Death
13	Mandy Exantus	CA	United States	Kenneth Simon	Sibling	United States	Solatium
14	Todd Simon	CA	United States	Kenneth Simon	Sibling	United States	Solatium
15	Susan Simon	SC	United States	Kenneth Simon	Parent	United States	Solatium
16	Jennifer Simon Berardi	NY	United States	Kenneth Simon	Sibling	United States	Solatium
17	John Doe 61, as Personal Representative of the Estate of Arthur Simon	NY	United States	Kenneth Simon	Parent (Deceased)	United States	Solatium
18	John Doe 62	NY	United States	Timothy Stackpole	PR	United States	Solatium/ Wrongful Death
19	Michael Stackpole	NY	United States	Timothy Stackpole	Sibling	United States	Solatium
20	Edward Stackpole	NY	United States	Timothy Stackpole	Sibling	United States	Solatium
21	Kathy Buell	NY	United States	Timothy Stackpole	Sibling	United States	Solatium
22	Patricia Murphy	NY	United States	Timothy Stackpole	Sibling	United States	Solatium

	Plaintiff's Name (alphabetical by last name)	Plaintiff's State of Residency at Filing (or death)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Full Name	Plaintiff's Relationship to 9/11 Decedent¹	9/11 Decedent's Citizenship/ Nationality on 9/11/01	Nature of Claim (wrongful death, solatium, personal injury)²
23	Jordanis Theodoridis	Switzerland	Switzerland	Michael Theodoridis	Sibling	Switzerland	Solatium
24	Jordanis Theodoridis	Switzerland	Switzerland	Michael Theodoridis	PR	Switzerland	Solatium/ Wrongful Death
25	Jordanis Theodoridis, as Personal Representative of the Estate of Constantinos Theodoridis	Switzerland	Switzerland	Michael Theodoridis	Parent (Deceased)	Switzerland	Solatium
26	Margarita Theodoridis	Switzerland	Switzerland	Michael Theodoridis	Parent	Switzerland	Solatium
27	Haleema Salie, as Personal Representative of the Estate of Rahma Salie	MA	Sri Lanka	Michael Theodoridis	Spouse (Deceased)	Greece	Solatium
28	Nia Jah-Selah Thompson	NC	United States	Vanavah Thompson	Child	Guyana	Solatium
29	Tsahai S. Santiago	NY	Guyana	Vanavah Thompson	Sibling	Guyana	Solatium
30	Rahsaan Thompson	NJ	United States	William Harry Thompson	Child	United States	Solatium
31	Michael K. Thompson	NJ	United States	William Harry Thompson	Child	United States	Solatium
32	Michael K. Thompson	NJ	United States	William Harry Thompson	PR	United States	Solatium/ Wrongful Death
33	Margaret M. Tobin	NY	United States	John Tobin	Sibling	United States	Solatium
34	Michael Tobin	NJ	United States	John Tobin	Sibling	United States	Solatium

	Plaintiff's Name (alphabetical by last name)	Plaintiff's State of Residency at Filing (or death)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Full Name	Plaintiff's Relationship to 9/11 Decedent¹	9/11 Decedent's Citizenship/ Nationality on 9/11/01	Nature of Claim (wrongful death, solatium, personal injury)²
35	Jennifer Dolan	NJ	United States	John Tobin	Child	United States	Solatium
36	Barbara Tobin	NJ	United States	John Tobin	Spouse	United States	Solatium
37	Barbara Tobin	NJ	United States	John Tobin	PR	United States	Solatium/ Wrongful Death
38	Sean Tobin	NJ	United States	John Tobin	Child	United States	Solatium
39	Salvatore M. Traina Jr.	NJ	United States	Christopher M. Traina	Sibling	United States	Solatium
40	Vasanta Velamuri	NJ	United States	Sankara Velamuri	PR	United States	Solatium/ Wrongful Death
41	Jennica Perez a/k/a Jennica Vera	NY	United States	David Vera	Child	United States	Solatium
42	Jennica Perez a/k/a Jennica Vera	NY	United States	David Vera	PR	United States	Solatium/ Wrongful Death
43	Javier Guzman	PA	United States	David Vera	Sibling	United States	Solatium
44	Clotilda Vola as Personal Representative of the Estate of John Vola	NY	United States	Maria P. Vola	Parent (Deceased)	United States	Solatium
45	Clotilda Vola as Personal Representative of the Estate of Rita Vola	NY	United States	Maria P. Vola	Parent (Deceased)	United States	Solatium
46	Clarissa B. Kirschenbaum	NY	United States	Victor Wald	Sibling	United States	Solatium

	Plaintiff's Name (alphabetical by last name)	Plaintiff's State of Residency at Filing (or death)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Full Name	Plaintiff's Relationship to 9/11 Decedent¹	9/11 Decedent's Citizenship/ Nationality on 9/11/01	Nature of Claim (wrongful death, solatium, personal injury)²
47	John Doe 63	NY	United States	Robert F. Wallace	PR	United States	Solatium/ Wrongful Death
48	Shirley Nottingham	VA	United States	Leonard A. White	Sibling	United States	Solatium
49	Shirley Nottingham	VA	United States	Leonard A. White	PR	United States	Solatium/ Wrongful Death
50	Shirley Nottingham as Personal Representative of the Estate of Thelma White	VA	United States	Leonard A. White	Parent (Deceased)	United States	Solatium
51	Marc C. White	TN	United States	Malissa White	Sibling	United States	Solatium
52	Sylvia Ball	AR	United States	Malissa White	Sibling	United States	Solatium
53	John Doe 64	VA	United States	Sandra L. White	PR	United States	Solatium/ Wrongful Death
54	John Doe 65	NY	United States	Wayne White	PR	United States	Solatium/ Wrongful Death
55	Daren White	NY	United States	Wayne White	Sibling	United States	Solatium
56	Showkatara Sharif	VA	United States	Shakila Yasmin	PR	United States	Solatium/ Wrongful Death
57	John Doe 66 as Personal Representative of the Estate of Nurul Miah	NY	United States	Shakila Yasmin	Spouse (Deceased)	United States	Solatium
58	Mary Kessler	OH	United States	Suzanne Youmans	Sibling	United States	Solatium

	Plaintiff's Name (alphabetical by last name)	Plaintiff's State of Residency at Filing (or death)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Full Name	Plaintiff's Relationship to 9/11 Decedent¹	9/11 Decedent's Citizenship/ Nationality on 9/11/01	Nature of Claim (wrongful death, solatium, personal injury)²
59	Mary Kessler	OH	United States	Suzanne Youmans	PR	United States	Solatium/ Wrongful Death
60	Joan Youmans as Personal Representative of the Estate of John Youmans	NY	United States	Suzanne Youmans	Sibling (Deceased)	United States	Solatium
61	BNY Mellon	NY	United States	Martin Morales Zempoaltecatl	PR	United States	Solatium/ Wrongful Death
62	Julia Morales Zempoaltecatl	Mexico	Mexico	Martin Morales Zempoaltecatl	Sibling	Mexico	Solatium
63	Maria P.M. Zempoaltecatl Cortez	NY	Mexico	Martin Morales Zempoaltecatl	Parent	Mexico	Solatium
64	Benjamin Morales Zempoaltecatl	Mexico	Mexico	Martin Morales Zempoaltecatl	Sibling	Mexico	Solatium
65	Jose Morales Zempoaltecatl	NY	Mexico	Martin Morales Zempoaltecatl	Sibling	Mexico	Solatium
66	Delfino Morales Zempoaltecatl	Mexico	Mexico	Martin Morales Zempoaltecatl	Sibling	Mexico	Solatium
67	Eusebio Morales Zempoaltecatl	NY	Mexico	Martin Morales Zempoaltecatl	Sibling	Mexico	Solatium
68	Glaflira Morales Zempoaltecatl	Mexico	Mexico	Martin Morales Zempoaltecatl	Sibling	Mexico	Solatium
69	Gonzalo Morales	NY	Mexico	Martin Morales Zempoaltecatl	Sibling	Mexico	Solatium
70	Daryl Gabriel	NY	United States	Benilda Domingo	Child	Philippines	Solatium
71	Jessica K. Kostaris	NY	United States	Bruce Gary	Child	United States	Solatium
72	Richard Gary	NY	United States	Bruce Gary	Child	United States	Solatium

	Plaintiff's Name (alphabetical by last name)	Plaintiff's State of Residency at Filing (or death)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Full Name	Plaintiff's Relationship to 9/11 Decedent¹	9/11 Decedent's Citizenship/ Nationality on 9/11/01	Nature of Claim (wrongful death, solatium, personal injury)²
73	Kristen C. Graf	MD	United States	Edwin John Graf III	Child	United States	Solatium
74	Tyler W. Graf	CA	United States	Edwin J. Graf, III	Child	United States	Solatium
75	Wesley J. Graf	GA	United States	Edwin J. Graf, III	Child	United States	Solatium
76	Jane Doe 69, as Personal Representative of the Estate of William J. Houston	NY	United States	Charles J. Houston	Sibling (Deceased)	United States	Solatium
77	Andrew McMahon	NY	United States	Robert D. McMahon	Sibling	United States	Solatium
78	Damon McMahon	NY	United States	Robert D. McMahon	Sibling	United States	Solatium
79	Constance Muldowney	NY	United States	Richard Muldowney	Spouse	United States	Solatium
80	Constance Muldowney	NY	United States	Richard Muldowney	PR	United States	Solatium/ Wrongful Death
81	John Muldowney	NY	United States	Richard Muldowney	Child	United States	Solatium
82	Constance Muldowney as Personal Representative of the Estate of Kathryn Muldowney	NY	United States	Richard Muldowney	Child (Deceased)	United States	Solatium
83	Thomas F. Owens	NY	United States	Peter Owens	Sibling	United States	Solatium
84	John Owens	NY	United States	Peter Owens	Sibling	United States	Solatium
85	Terence Owens	NY	United States	Peter Owens	Sibling	United States	Solatium

	Plaintiff's Name (alphabetical by last name)	Plaintiff's State of Residency at Filing (or death)	Plaintiff's Citizenship/ Nationality on 9/11/01	9/11 Decedent's Full Name	Plaintiff's Relationship to 9/11 Decedent¹	9/11 Decedent's Citizenship/ Nationality on 9/11/01	Nature of Claim (wrongful death, solatium, personal injury)²
86	Kevin Owens	NY	United States	Peter Owens	Sibling	United States	Solatium
87	Susan G. Rescorla	NJ	United States	Richard C. Rescorla	Spouse	United States	Solatium
88	Susan G. Rescorla	NJ	United States	Richard C. Rescorla	PR	United States	Solatium/ Wrongful Death
89	Trevor S. Rescorla	NJ	United States	Richard C. Rescorla	Child	United States	Solatium
90	Kimberly J. Rescorla	NJ	United States	Richard C. Rescorla	Child	United States	Solatium
91	Andrew Soulas	NJ	United States	Timothy Soulas	Child	United States	Solatium
92	Christopher Soulas	NJ	United States	Timothy Soulas	Child	United States	Solatium
93	Matthew Soulas	NJ	United States	Timothy Soulas	Child	United States	Solatium
94	Timothy Soulas Jr.	NJ	United States	Timothy Soulas	Child	United States	Solatium
95	Katherine Soulas	NJ	United States	Timothy Soulas	Spouse	United States	Solatium
96	Katherine Soulas	NJ	United States	Timothy Soulas	PR	United States	Solatium/ Wrongful Death
97	Katherine Soulas as Natural Guardian of DRS	NJ	United States	Timothy Soulas	Child (Minor)	United States	Solatium
98	Aaron Straub	FL	United States	Edward Straub	Child	United States	Solatium